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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION }
Court: Hon. Samuel Conti
This Document Related to All Cases }

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND LIMITED DISCOVERY STAY**

WHEREAS the Court, on September 12, 2008, entered an Order pursuant to Stipulation, granting a Limited Stay of Discovery for six (6) months, which was to expire on March 12, 2009 (“September 12, 2008 Stay Order”);

WHEREAS the Court, on February 5, 2009, entered an Order pursuant to Stipulation modifying and extending the September 12, 2008 Stay Order until September 11, 2009, with limitations on deposition discovery continuing until January 4, 2010 (“February 5, 2009 Stay Order”);

WHEREAS on June 8, 2009, Special Master Charles A. Legge, entered an Order further

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1 extending the February 5, 2009 Stay Order, "until such time as the Court has issued its
2 decision(s) on the various motions to dismiss that were filed on May 18, 2009 ("June 8, 2009
3 Stay Order");

4 WHEREAS there is an ongoing criminal grand jury investigation involving the products
5 at issue in this case;

6 WHEREAS the parties have met and conferred and agreed to request modification and
7 extension of the September 12, 2008, February 5, 2009, and June 8, 2009 Stay Orders;

8 PLAINTIFFS, DEFENDANTS, AND THE UNITED STATES, BY AND THROUGH
9 THEIR UNDERSIGNED COUNSEL, HEREBY STIPULATE AND AGREE AS FOLLOWS:

10 That Paragraph 3 of the September 12, 2008 Stay Order shall be modified and replaced
11 in its entirety with the following new Paragraph 3:

12 During the pendency of the grand jury proceedings and any resulting criminal
13 trials, no discovery shall be conducted in this case (including, without limitation,
14 document requests, interrogatories, requests to admit, or depositions) that reflects, refers
15 to, or relates to grand jury proceedings concerning CRTs or CRT products, including any
16 party's or witness's communications with the United States, or with any grand jury
17 investigating CRTs or CRT products, except by the order of the Court upon good cause
18 shown and consistent with governing law.

19 That Paragraph 5 of the June 8, 2009 Stay Order shall be modified and that Paragraph
20 2(b) of the February 5, 2009 Stay Order shall be modified and replaced in its entirety with the
21 following new Paragraph 2(b):

22 The Stay Period, as defined in paragraph 1 of the February 5, 2009 Stay Order,
23 shall be extended until March 8, 2010. Moreover, no deposition discovery may be taken
24 until November 1, 2010, with the following exception: Beginning on March 8, 2010,
25 depositions may be taken of defendants' customers or suppliers, or their employees,
26 provided in any case that the deponent is not a defendant or a subsidiary or affiliate of a
27 defendant, or an employee, agent, or former employee of any of them. Such deposition
28 subpoenas may include requests for documents to be produced by the deponent at the

1 deposition, provided that no document requests may request the production of
2 documents disclosing the contents of the witness' testimony, if any, before the grand jury
3 or communications with the United States that reflect, refer to, or relate to the grand jury
4 proceedings.

5

6 **IT IS SO STIPULATED.**

7 Dated: December 22, 2009

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15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16 Dated: January 5, 2010



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